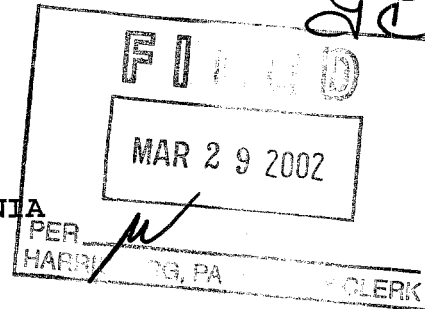


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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA



GREENE/GUILFORD ENVIRONMENTAL :
ASSOCIATION, a non-profit corporation :
incorporated under the laws of the :
Commonwealth of Pennsylvania, CITIZENS :
FOR PLANNED COMMUNITY GROWTH, :
an unincorporated association organized :
under the laws of the Commonwealth of :
Pennsylvania, PAUL B. AMBROSE, JOHN G. :
ENDERS, CHARLES F. RAHAUSER, BETSY :
RAHAUSER, DOUGLAS A. WARNOCK, U.X. :
VAGNERINI, THOMAS W. BUNDY, STEPHEN P. :
BUCHER, ROGER J. ROBERTSON, JAMES A. :
STRITE, JR., DAVID A. GUTHRIE, :

CIVIL ACTION NO.
1:CV-01-0910

✓ (RAMBO, J.)

Plaintiffs,

v.

KEN WYKLE, Administrator, Federal
Highway Administration, ROBERT GATZ,
Federal Highway Administration,

Defendants,

and

BRADLEY L. MALLORY, Secretary for
The Department of Transportation,
Commonwealth of Pennsylvania,

Intervenor.

MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE

The federal defendants, together with the intervenor, by and
through their undersigned counsel, hereby move the Court for an

extension of the deadline by which to file dispositive motions and, in support thereof, state as follows:

1. The present deadline for filing dispositive motions is March 30, 2002;

2. Pending before the Court is the Intervenor's motion for Reconsideration of this Court's March 1, 2002 order resolving the plaintiffs' motion to supplement the administrative record;

3. The intervenor's reply brief in support of its motion is due on or about April 1, 2002;

4. Defendants and the intervenor have been informed that plaintiffs have filed a motion to extend the dispositive motion deadline to December 2002, a date which reflects plaintiffs' presumption that this Court will deny the motion for reconsideration;

5. Defendants and the intervenor are prepared to file their motion for summary judgment within the existing deadline; should they do so, however, plaintiffs would likely request an enlargement of the response date to permit resolution of the pending motion for reconsideration asserting that any response must necessarily allow for receipt of the documents at issue in that motion;

6. All parties agree that cross motions for summary judgment, considered together by the Court, would represent the best use of time and resources of all parties and of the Court;

7. To accomplish this end, defendants and the intervenor suggest that the present deadline be extended until a date to be

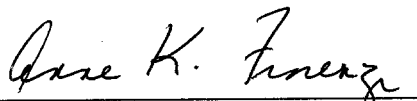
established by the Court at the time that it rules on the motion for reconsideration. This would allow for a relatively short deadline should the Court grant the motion for reconsideration, or a lengthy enlargement if the motion is denied.

8. Plaintiffs concur in the relief requested in this motion.

WHEREFORE, defendants and the intervenor respectfully ask this Court to extend the dispositive motion deadline pending resolution of the motion for reconsideration.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney


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Commonwealth of Pennsylvania
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Harrisburg, PA 17190
(717) 787-5299
Fax: (717) 772-2741

Dated: March 29, 2002

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GREENE/GUILFORD ENVIRONMENTAL :
ASSOCIATION, et al, : CIVIL ACTION NO.
: 1:CV-01-0910
Plaintiffs, :
v. :
KEN WYKLE, et al., :
Defendants, :
and :
BRADLEY L. MALLORY, :
Intervenor. :

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on March 29, 2002, she served a copy of the attached:

MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

Addressee:

Thomas Alan Linzey, Esquire
COMMUNITY ENVIRONMENTAL LEGAL DEFENSE FUND
2859 Scotland Road
Chambersburg, Pennsylvania 17201


Naomi Zimmerman
Legal Assistant